

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff

v.

CIVIL NO.: 19-

**FUNDS IN THE AMOUNT OF
\$53,082,824.19.00 IN U.S. CURRENCY,
CONTAINED IN THE FOLLOWING
ACCOUNTS UNDER THE NAME OF
BANCO SAN JUAN INTERNATIONAL:**

a) **xxx-x7689 – MERRILL LYNCH**
ADDRESS: #15 SECOND ST.,
SUITE 210, GUAYNABO, PR
00968, UP TO \$10,000,000.00;

b) **xxx-x7059 – MERRILL LYNCH**
ADDRESS: 225 LIBERTY ST.,
41ST FL, NEW YORK, NY 10281,
UP TO \$5,000,000.00; AND

c) **FEDERAL RESERVE BANK OF**
NEW YORK ACCOUNT # xxxx-
x228-6, UP TO \$38,082,824.19,

Defendant

MOTION REQUESTING ISSUANCE OF
WARRANT OF ARREST IN REM AND SEIZURE

TO THE HONORABLE COURT:

COMES NOW the United States of America, through its undersigned attorneys, and very respectfully states and prays as follows:

1. Plaintiff has filed forfeiture proceedings against the defendant currency, pursuant to Title 18, United States Code, Sections 981(a)(1)(A),(C) and Title 18 United States Code, Section

984.

2. Pursuant to Title 18, United States Code, Section 981(b)(2), Warrants of Arrest *in Rem* and Seizure were filed along with the Complaint for Forfeiture *in Rem*.

3. The purpose of the Warrants of Arrest *in Rem* and Seizure is that the Court acquires jurisdiction over the defendant property.

4. The Warrants are needed so that due process may issue to enforce the forfeiture, and to give notice to the interested parties to appear in court and show cause why the forfeiture should not be decreed.

WHEREFORE, plaintiff United States of America prays to the Honorable Court to expeditiously issue the above-mentioned warrant, and that the originals of the same be delivered to the U.S. Attorney for the District of Puerto Rico, who will make the arrangements for their service according to law.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 27th day of September, 2019.

ROSA EMILIA RODRIGUEZ-VELEZ
United States Attorney

s/ David O. Martorani-Dale
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